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17 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

18 SALEM LEHR, an Individual;

19 Case No.: 2:23-cv-02041-APG-DJA

20 Plaintiff,

21 v.

22 **STIPULATION AND ORDER TO**  
**EXTEND DEADLINES TO SUBMIT**  
**STIPULATION OF DISMISSAL OR**  
**STATUS REPORT**

23 AMAZON.COM SERVICES, LLC a  
24 Foreign Limited-Liability Company;  
25 DOES 1 Through 25, inclusive; and ROE  
CORPORATIONS 1 Through 25,  
inclusive,

26 Defendants.

1 **STIPULATION AND ORDER TO EXTEND DEADLINES TO SUBMIT STIPULATION**  
2 **OF DISMISSAL OR STATUS REPORT**

3 Plaintiff, SALEM LEHR, and Defendant, AMAZON.COM SERVICES, LLC, by and  
4 through their respective attorneys of record, hereby submit the following Joint Status Report:

5 **1. Status of Action**

6 The parties appeared for an Early Neutral Evaluation (“ENE”) on January 31, 2024. The  
7 parties were unable to reach a settlement at the ENE. Although, shortly after, the parties were  
8 able to reach a resolution. The Court was notified by the parties’ Joint Status Report that the  
9 matter had resolved. The Court thereafter ordered the parties to submit a Stipulation of Dismissal  
10 and Proposed Order no later than March 1, 2024.

11 Defendant has drafted the settlement documents. Plaintiff has agreed to the final language  
12 in the settlement agreement. Thus, the parties are now working to fully execute the settlement  
13 agreement. Accordingly, while the parties have remained in contact regarding executing final  
14 settlement documents, more time is needed to finalize and submit a Stipulation of Dismissal.

15 The parties submitted a Joint Status Report on March 1, 2024. On March 5, 2024, the  
16 Court entered an order that a request to extend a deadline must be made by motion or stipulation,  
17 pursuant to Local Rule IA 6-1. Accordingly, the parties have stipulated to an additional 30 days  
18 to review and submit settlement documents to the Court.

19 **2. Stipulation and Request for Extension**

20 The parties have stipulated to an additional 30 days in which to submit the Stipulation of  
21 Dismissal and Proposed Order to the Court. Accordingly, the parties respectfully request an  
22 additional 30 days to submit the Stipulation of Dismissal and Proposed Order to the Court.

23 ///

24 ///

25 ///

**\*SIGNATURE PAGE TO FOLLOW\***

1 Dated this 12<sup>th</sup> day of March, 2024

2 Respectfully submitted,

3  
4 /s/ Patrick W. Kang, Esq.  
5 PATRICK W. KANG, ESQ.  
6 KYLE R. TATUM, ESQ.  
7 CHRISTIAN Z. SMITH, ESQ.  
8 PAUL H. WOLFRAM, ESQ.  
9 KANG & ASSOCIATES, PLLC  
10 Attorneys for Plaintiff  
11 SALEM LEHR

Dated this 12<sup>th</sup> day of March, 2024

Respectfully submitted,

12 /s/ Emil S. Kim, Esq.  
13 Z. KATHERYN BRANSON, ESQ.  
14 EMIL S. KIM, ESQ.  
15 LITTLER MENDELSON, P.C.  
16 Attorneys for Defendant  
17 AMAZON.COM SERVICES LLC

**ORDER**

18 Based upon the above stipulation of the parties the Court orders the parties shall have an  
19 additional 30 days from March 1, 2024, until Monday, April 1, 2024, in which to submit final  
20 settlement documents.

21 IT IS SO ORDERED:

22 Dated: March 13, 2024

23  
24   
25 ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE